

JUN/17/2011/FRI 11:21 AM PAIN&SURGICAL CENTER

FAX No. 267 212 5001

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06/16/2011 14:29 7324932643

DEGENNARD

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Attorney(s) Alfred DeGennaro
 Office Address 12 Christopher Way -Suite 200
 Town, State, Zip Code Eatonstown, NJ
 Telephone Number (732) 493-8211
 Attorney(s) for Plaintiff Alice O'Brien

Alice O'Brien

Superior Court of New Jersey

Ocean COUNTY
 Law Division - Civil Part DIVISION

Docket No: L-1905-11

Plaintiff(s)

Vs.

The Pain and Surgical Center of Langhorne

Doctor Phillip Sasso

Defendant(s)

CIVIL ACTION SUMMONS

From The State of New Jersey To The Defendant(s) Named Above:

The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The complaint attached to this summons states the basis for this lawsuit. If you dispute this complaint, you or your attorney must file a written answer or motion and proof of service with the deputy clerk of the Superior Court in the county listed above within 35 days from the date you received this summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the complaint is one in foreclosure, then you must file your written answer or motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your answer or motion when it is filed. You must also send a copy of your answer or motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written answer or motion (with fee of \$135.00 and completed Case Information Statement) if you want the court to hear your defense.

If you do not file and serve a written answer or motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.

If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-L6NJ-LAW (1-888-576-5529). A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.

Jennifer M. Perez
 Jennifer M. Perez,
 Acting Clerk of the Superior Court

DATED: 06/16/2011

Name of Defendant to Be Served: The Pain and Surgical Center of Langhorne

Address of Defendant to Be Served: 820 Town Center Drive, Suite 200, Langhorne, PA 19047

NOTE: The Case Information Statement is available at www.njcourts.com.

Revised 09/01/2010, CN 10792-English (Appendix XII-A)

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Directory of Superior Court Deputy Clerk's Offices County Lawyer Referral and Legal Services Offices

ATLANTIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Direct Filing
1201 Bacharach Blvd., First Fl.
Atlantic City, NJ 08401

LAWYER REFERRAL

(609) 343-3444
LEGAL SERVICES
(609) 348-4200

BERGEN COUNTY:

Deputy Clerk of the Superior Court
Civil Division, Room 115
Justice Center, 10 Main St.
Hackensack, NJ 07601

LAWYER REFERRAL

(201) 488-0044
LEGAL SERVICES
(201) 487-2166

BURLINGTON COUNTY:

Deputy Clerk of the Superior Court
Central Processing Office
Attn: Judicial Intake
First Fl., Courts Facility
49 Rancocas Rd.
Mt. Holly, NJ 08060

LAWYER REFERRAL

(609) 261-4862
LEGAL SERVICES
(800) 496-4370

CAMDEN COUNTY:

Deputy Clerk of the Superior Court
Civil Processing Office
Hall of Justice
1st Fl., Suite 150
101 South 3rd Street
Camden, NJ 08103

LAWYER REFERRAL

(856) 964-4520
LEGAL SERVICES
(856) 964-2010

CAPE MAY COUNTY:

Deputy Clerk of the Superior Court
9 N. Main Street
Cape May Court House, NJ 08210

LAWYER REFERRAL

(609) 463-0313
LEGAL SERVICES
(609) 465-3001

CUMBERLAND COUNTY:

Deputy Clerk of the Superior Court
Civil Case Management Office
60 West Broad Street
P.O. Box 10
Bridgeton, NJ 08302

LAWYER REFERRAL

(856) 696-5530
LEGAL SERVICES
(856) 691-0494

ESSEX COUNTY:

Deputy Clerk of the Superior Court
Civil Customer Service
Hall of Records, Room 201
465 Dr. Martin Luther King Jr. Blvd.
Newark, NJ 07102

LAWYER REFERRAL

(973) 622-6204
LEGAL SERVICES
(973) 624-4300

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GLOUCESTER COUNTY:
 Deputy Clerk of the Superior Court
 Civil Case Management Office
 Adult Intake
 First Fl., Court House
 1 North Broad Street
 Woodbury, NJ 08096

LAWYER REFERRAL
 (856) 848-4589
LEGAL SERVICES
 (856) 848-3360

HUDSON COUNTY:
 Deputy Clerk of the Superior Court
 Superior Court, Civil Records Dept.
 Brennan Court House--1st Floor
 583 Newark Ave.
 Jersey City, NJ 07306

LAWYER REFERRAL
 (201) 798-2727
LEGAL SERVICES
 (201) 792-6363

HUNTERDON COUNTY:
 Deputy Clerk of the Superior Court
 Civil Division
 65 Park Avenue
 Flemington, NJ 08822

LAWYER REFERRAL
 (908) 735-2611
LEGAL SERVICES
 (908) 782-7979

MERCER COUNTY:
 Deputy Clerk of the Superior Court
 Local Filing Office, Courthouse
 175 S. Broad Street, P.O. Box 8068
 Trenton, NJ 08650

LAWYER REFERRAL
 (609) 585-6200
LEGAL SERVICES
 (609) 695-6249

MIDDLESEX COUNTY:
 Deputy Clerk of the Superior Court,
 Middlesex Vicinage
 2nd Floor - Tower
 56 Paterson Street, P.O. Box 2633
 New Brunswick, NJ 08903-2633

LAWYER REFERRAL
 (732) 828-0033
LEGAL SERVICES
 (732) 249-7600

MONMOUTH COUNTY:
 Deputy Clerk of the Superior Court
 Court House
 P.O. Box 1269
 Freehold, NJ 07728-1269

LAWYER REFERRAL
 (732) 431-5544
LEGAL SERVICES
 (732) 866-0020

MORRIS COUNTY:
 Morris County Courthouse
 Civil Division
 Washington and Court Streets
 P. O. Box 910
 Morristown, NJ 07963-0910

LAWYER REFERRAL
 (973) 267-5882
LEGAL SERVICES
 (973) 285-6911

OCEAN COUNTY:
 Deputy Clerk of the Superior Court
 118 Washington Street, Room 121
 P.O. Box 2191
 Toms River, NJ 08754-2191

LAWYER REFERRAL
 (732) 240-3666
LEGAL SERVICES
 (732) 341-2727

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PASSAIC COUNTY:

Deputy Clerk of the Superior Court
Civil Division
Court House
77 Hamilton Street
Paterson, NJ 07505

LAWYER REFERRAL
(973) 278-9223
LEGAL SERVICES
(973) 523-2900

SALEM COUNTY:

Deputy Clerk of the Superior Court
Attn: Civil Case Management Office
92 Market Street
Salem, NJ 08079

LAWYER REFERRAL
(856) 535-5629
LEGAL SERVICES
(856) 451-0003

SOMERSET COUNTY:

Deputy Clerk of the Superior Court
Civil Division
P.O. Box 3000
40 North Bridge Street
Somerville, N.J. 08876

LAWYER REFERRAL
(908) 685-2329
LEGAL SERVICES
(908) 231-0840

SUSSEX COUNTY:

Deputy Clerk of the Superior Court
Sussex County Judicial Center
43-47 High Street
Newton, NJ 07860

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(973) 383-7400

UNION COUNTY:

Deputy Clerk of the Superior Court
1st Fl., Court House
2 Broad Street
Elizabeth, NJ 07207-6073

LAWYER REFERRAL
(908) 353-4715
LEGAL SERVICES
(908) 354-4340

WARREN COUNTY:

Deputy Clerk of the Superior Court
Civil Division Office
Court House
413 Second Street
Belvidere, NJ 07823-1500

LAWYER REFERRAL
(973) 267-5882
LEGAL SERVICES
(908) 475-2010

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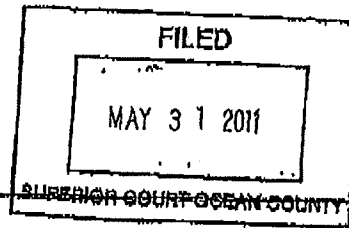
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 OK MO CA 1158
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 Amount \$ 200.00
 DATE 5-31-11
 OVP
 Initials MC

Alfred DeGennaro, Esquire
 Alfred DeGennaro LLC
 12 Christopher Way, Suite 200
 Eatontown, NJ 07724
 732-493-8211

Mrs. Alice O'Brien

Plaintiff

vs.

The Pain and Surgical Center of Langhorne
 Doctor Phillip Sasso
 Defendants

SUPERIOR COURT
 OF NEW JERSEY

L 1905-11

OCEAN COUNTY
 Law Division-Civil Part

Civil Action No.
 Complaint and Jury Demand

Plaintiff, by and through its undersigned counsel files this complaint against Defendants bringing this action for relief arising from Plaintiff, Alice O'Brien Age 87, falling at The Pain and Surgical Center of Langhorne while walking to receiving injections for her treatment of apinal stenosis, by her treating physician Dr. Phillip Sasso as well as their failure to administer pain relief after the fall. Plaintiff, Alice O'Brien (who suffered a dislocated shoulder and contusions and abrasions to her face) alleges that the defendants owed the Plaintiff a duty and failed to perform that duty within an acceptable standard of medical care through inadequate supervision while she was walking and failure to treat her injuries after she fell. Defendants also breached their duty by ordinary Negligence resulting in the fall and the failure to administer first aid/pain relief. Plaintiff now brings this action claiming Medical Malpractice as well as ordinary Negligence.

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In support thereof, Plaintiff alleges as follows:

STATEMENT OF JURISDICTION AND VENUE

Plaintiff presently is and was a resident of Ocean County New Jersey at the time this cause of action arose. This cause of action arises from the Plaintiff, Alice O'Brien Age 87, falling and dislocating her shoulder at The Pain and Surgical Center of Langhorne while walking to receive to receive treatment for her spinal stenosis, by her treating physician Dr. Phillip Sasso as well as the failure of the Defendants to administer medical attention for pain relief after the fall. The Pain and Surgical Center of Langhorne is located in Langhorne Pennsylvania approximately 8 miles from Trenton, New Jersey. Mrs. Alice O'Brien was a patient of the Defendants and first visited the surgical center for her first treatment approximately 2 years prior to the accident. After the first treatment she was asked to make a new appointment. Prior discussions with Doctor Sasso indicated that the treatments would not be on a regular schedule, so she explained she would return when the pain would indicate the need. She returned for approximately 3 more treatments and on or about May 28, 2009 she fell after signing in and beginning to walk to the treatment room when the staff member responsible for escorting her walked out of reach. Plaintiff asserts that the New Jersey Superior Court has specific jurisdiction over this case due to the prior establishment of an ongoing doctor patient relationship with a citizen of New Jersey by The Pain and Surgical Center of Langhorne and Dr. Sasso which began approximately 2 years prior to the accident and the Defendants solicitation for Plaintiff to return. In addition given the 8 mile proximity of the Pain and Surgical Center of Langhorne to the State Capital of Trenton, New Jersey should specific jurisdiction be challenged detailed discovery should establish general jurisdiction, independently or bolster Plaintiff's argument concerning specific jurisdiction.

THE PARTIES

- 1) Plaintiff, Mrs. Alice O'Brien, Age 87 residing at 22 Greenwich Ave. Manchester, County of Ocean, NJ 08759
- 2) Defendant, The Pain and Surgical Center of Langhorne, 820 Town Center Drive, Suite 200, Langhorne, Bucks County, PA 19047

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- 3) Defendant, Doctor Philip Sasso, Plaintiff's treating physician at The Pain and Surgical Center of Langhorne, 820 Town Center Drive, Suite 200, Langhorne, Bucks County, PA 19047

FACTS COMMON TO ALL COUNTS OF THE COMPLAINT

- 1) Plaintiff, Mrs. Alice O'Brien, was being treated at The Pain and Surgical Center of Langhorne for Spinal Stenosis, by her treating physician Dr. Philip Sasso.
- 2) The Pain and Surgical Center of Langhorne is located in Langhorne Pennsylvania approximately 8 miles from Trenton, New Jersey.
- 3) Mrs. Alice O'Brien, a resident of Manchester, New Jersey, received her first treatment at The Pain and Surgical Center of Langhorne approximately 2 years prior to the accident which occurred on or about May 28, 2009.
- 4) After the first treatment she was asked to make a new appointment. Prior discussions with Doctor Sasso indicated that the pain treatments would not be on a regular schedule, so she explained she would return when the pain indicated the need.
- 5) She returned for approximately 3 more treatments and on or about May 28, 2009 after signing in for that treatment, Mrs. O'Brien was being escorted to the treatment room, when the staff member escorting her walked up ahead and was no longer standing on her side and therefore out of reach of Mrs. O'Brien.
- 6) Mrs. O'Brien then fell dislocating her shoulder and suffering contusions and abrasions to her face.

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7) Plaintiff, in agonizing pain repeatedly requested she be united with her daughter Carol Menapace, who was in the waiting room.

8) The response to these requests was slow adding to the emotional distress the Plaintiff was experiencing.

9) Plaintiff received no medical treatment for pain relief after her fall by either her treating physician, Dr. Sasso, or any other doctors at The Pain and Surgical Center of Langhorne. Defendants merely arranged to have Plaintiff taken to St. Mary's Hospital by ambulance.

10) Plaintiff was in an incapacitated sling for approximately 4-5 weeks and also received therapy sessions during that time and until the first week of September 2009. During the period of her release from the hospital and through the first week of September of 2009 she was living with her daughter Carol who tended to her personal as well household needs.

11) After the accident Ms. O'Brien returned to the center for more visits through the summer of 2011

12) As a proximate result of the ordinary negligence, as well as the breach of the applicable standards of medical care (professional negligence) by The Pain and Surgical Center of Langhorne and Dr. Sasso, the Plaintiff suffered: (1) a dislocated shoulder and contusions and abrasions to her face (2) enormous pain (3) great emotional distress and (4) enormous inconvenience including the inability to tend to her personal and household needs during a 3 month period. Plaintiff, Mrs. Alice O'Brien now sues:

COUNT I

PLAINTIFF vs. DEFENDANTS' ORDINARY NEGLIGENCE FOR INADEQUATE SUPERVISION

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13) Plaintiff, Alice O'Brien, incorporates by reference all other paragraphs of this complaint as if fully set forth here and on information and belief further alleges as follows:

14) Both Defendants had a duty to Plaintiff to adequately supervise Plaintiff while walking to the treatment room after she signed in and failed to perform that duty within an acceptable standard.

15) The failure to provide that adequate supervision was an intentional and reckless omission.

16) WHEREFORE, Plaintiff respectfully asks the Court grant the Plaintiff a judgment that the Defendants breached their duty and awarding Plaintiff all damages punitive damages, attorney fees, and all costs.

COUNT II

PLAINTIFF vs. DEFENDANTS' ORDINARY NEGLIGENCE FOR FAILING TO PROVIDE FIRST AID AND TREATMENT AFTER THE PLAINTIFF FELL

17) Plaintiff, Alice O'Brien, incorporates by reference all other paragraphs of this complaint as if fully set forth here and on information and belief further alleges as follows:

18) Both Defendants had a duty to Plaintiff to provide first aid treatment after her fall and they failed to perform that duty.

19) The failure to provide that first aid and treatment was an intentional and reckless omission.

20) WHEREFORE, Plaintiff respectfully asks the Court to grant the Plaintiff a judgment that the Defendants breached their duty and awarding Plaintiff all damages, punitive damages, attorney fees, and all costs.

COUNT III

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PLAINTIFF vs. DEFENDANTS' PROFESSIONAL NEGLIGENCE FOR INADEQUATE SUPERVISION

21) Plaintiff, Alice O'Brien, incorporates by reference all other paragraphs of this complaint as if fully set forth here and on information and belief further alleges as follows:

22) Both Defendants had a duty to Plaintiff to adequately supervise Plaintiff while walking to the treatment room for spinal stenosis treatment after she signed in and failed to perform that duty within an acceptable standard of medical care.

23) The failure to provide that adequate supervision was an intentional and reckless omission.

24) WHEREFORE, Plaintiff respectfully asks the Court grant the Plaintiff a judgment that both the Defendants breached their duty to perform within an acceptable standard of medical care and awarding Plaintiff all damages, punitive damages, attorney fees, and all costs.

COUNT IV

PLAINTIFF vs. DEFENDANTS' PROFESSIONAL NEGLIGENCE FOR ABANDONING THEIR RESPONSIBILITIES TO TREAT THEIR PATIENT

25) Plaintiff, Alice O'Brien, incorporates by reference all other paragraphs of this complaint as if fully set forth here and on information and belief further alleges as follows:

26) Both Defendants had a duty to Plaintiff to provide medical care/pain relief after the Plaintiff's fall as they were her treating physicians and they breached that duty to provide medical care.

27) The failure to provide that medical care was an intentional and reckless omission.

28) WHEREFORE, Plaintiff respectfully asks the Court grant the Plaintiff a judgment that the Defendants breached their duty to provide said medical care and awarding Plaintiff all damages, punitive damages, attorney fees, and all costs.

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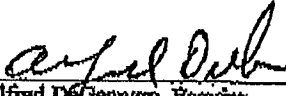
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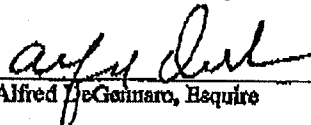
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By:  5-31-11
Alfred DeGennaro, Esquire
Attorney for Plaintiff

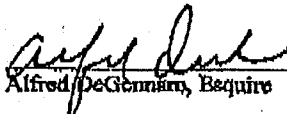
DESIGNATION OF TRIAL COUNSEL

Pursuant to New Jersey Court Rule 4:25-4, Alfred DeGennaro, Esquire, is hereby designated as trial counsel for the Plaintiff, in the above matter.

 5-31-11
Alfred DeGennaro, Esquire

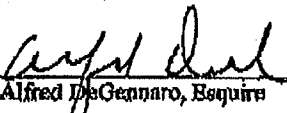
CERTIFICATION OF NO OTHER ACTIONS

Pursuant to New Jersey Court Rule 4:5-1 b(2), it is hereby stated that the matter in controversy is not the subject of any other action pending in any other court or of a pending arbitration proceeding to the best of my knowledge or belief. Also, to the best of my belief, no other action or arbitration proceeding is contemplated. However, other than the parties set forth in this pleading more parties may be joined if discovery through this lawsuit produces the names of other parties liable. In addition, I recognize the continuing obligation of each party to file and serve on all parties and the Court an amended certification if there is a change in the facts stated in this original certification.

 5-31-11
Alfred DeGennaro, Esquire

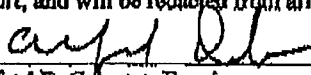
JURY DEMAND

Plaintiff, hereby demand trial by a jury on all triable issues raised in this complaint, pursuant to New Jersey Court Rule 4:35-1(a).

 5-31-11
Alfred DeGennaro, Esquire

CERTIFICATION IN ACCORDANCE WITH RULE 1:38-7 (B)

I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b)

 5-31-11
Alfred DeGennaro, Esquire

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Appendix XII-B1

CIVIL CASE INFORMATION STATEMENT (CIS)		FOR USE BY CLERK'S OFFICE ONLY	
 <p>Use for Initial Law Division Civil Part pleadings (not motions) under Rule 4:5-1 Pleading will be rejected for filing, under Rule 1:6-8(c), if information above the black bar is not completed or attorney's signature is not affixed</p>		PAYMENT TYPE: <input type="checkbox"/> CK <input type="checkbox"/> OS <input type="checkbox"/> CA	
		CHG/CK NO.	
		AMOUNT:	
		OVERPAYMENT:	
BATCH NUMBER:			
ATTORNEY/PROSE NAME Alfred DeGennaro, Esquire		TELEPHONE NUMBER (732) 493-8211	COUNTY OF VENUE Ocean
FIRM NAME (if applicable) Alfred DeGennaro LLC		DOCKET NUMBER (when available) L1905-11	
OFFICE ADDRESS 12 Christopher Way, Suite 200, Eatontown, NJ 07724		DOCUMENT TYPE COMPLAINT	
JURY DEMAND <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO			
NAME OF PARTY (e.g., John Doe, Plaintiff) Alice O'Brien - Plaintiff		CAPTION Alice O'Brien, - Plaintiff v. The Pain and Surgical Center of Langhorne - Defendant Doctor Phillip Sasso - Defendant	
CASE TYPE NUMBER (See reverse side for listing) 604		IS THIS A PROFESSIONAL MALPRACTICE CASE? <input checked="" type="checkbox"/> YES <input type="checkbox"/> NO IF YOU HAVE CHECKED "YES," SEE N.J.S.A. 2A:53A-27 AND APPLICABLE CASE LAW REGARDING YOUR OBLIGATION TO FILE AN AFFIDAVIT OF MERIT. IF YES, LIST DOCKET NUMBER	
RELATED CASES PENDING? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No			
DO YOU ANTICIPATE ADDING ANY PARTIES (arising out of same transaction or occurrence)? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		NAME OF DEFENDANT'S PRIMARY INSURANCE COMPANY (if known) Healthcare Providers Insurance Exchange <input type="checkbox"/> NONE <input type="checkbox"/> UNKNOWN	
THE INFORMATION PROVIDED ON THIS FORM CANNOT BE INTRODUCED INTO EVIDENCE.			
CASE CHARACTERISTICS FOR PURPOSES OF DETERMINING IF CASE IS APPROPRIATE FOR MEDIATION			
DO PARTIES HAVE A CURRENT, PAST OR RECURRENT RELATIONSHIP? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		IF YES, IS THAT RELATIONSHIP: <input type="checkbox"/> EMPLOYER/EMPLOYEE <input type="checkbox"/> FRIEND/NEIGHBOR <input checked="" type="checkbox"/> OTHER (explain) <input type="checkbox"/> FAMILIAL <input type="checkbox"/> BUSINESS was Doctor-Patient	
DOES THE STATUTE GOVERNING THIS CASE PROVIDE FOR PAYMENT OF FEES BY THE LOSING PARTY? <input type="checkbox"/> YES <input checked="" type="checkbox"/> NO			
USE THIS SPACE TO ALERT THE COURT TO ANY SPECIAL CASE CHARACTERISTICS THAT MAY WARRANT INDIVIDUAL MANAGEMENT OR ACCELERATED DISPOSITION			
<div style="border: 1px solid black; padding: 10px; width: fit-content; margin: 0 auto;"> <p>FILED</p> <p>MAY 31 2011</p> </div>			
 DO YOU OR YOUR CLIENT NEED ANY DISABILITY ACCOMMODATIONS? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, PLEASE IDENTIFY THE REQUIRED ACCOMMODATION	
WILL AN INTERPRETER BE NEEDED? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		IF YES, FOR WHAT LANGUAGE?	
I certify that confidential personal identifiers have been redacted from documents now submitted to the court, and will be redacted from all documents submitted in the future in accordance with Rule 1:38-7(b).			
ATTORNEY SIGNATURE: <i>Alfred DeGennaro</i> 5-31-11			

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OKLAHOMA COUNTY SUPERIOR COURT
OKLAHOMA COUNTY COURTHOUSE
CIVIL LAW DIVISION
TOMMY RIVER MO 67554
COURT TELEPHONE NO. (732) 523-2016
COURT HOURS

TRIAL ASSIGNMENT NOTICE

DATE: JUNE 06, 2011
RE: CRUISE VS THE FAIR AND SURETY CENTER OF LAWRENCE
MOTION: CIVIL L-404305 JJ

THE ABOVE CASE HAS BEEN ASSIGNED TO: TRUCK 3.

DISCOVERY IS SET THIS AND THIS WEEK THE FIRST ANSWER OR 30 DAYS
FROM SERVICE OF THE FIRST DEFENDANT, WHICHEVER COMES FIRST.

THE PRESENT JUDGE ASSIGNED IS: HON JOSHUA L. FORSTER

IF YOU HAVE ANY QUESTIONS, CONTACT TEAM 602
AT: (732) 523-4771.

IF YOU BELIEVE THAT THE JUDGE IS INAPPROPRIATE YOU MUST FILE A
PETITION OF GOOD CAUSE WITHIN 30 DAYS OF THE FILING OF YOUR PLEADING.
FURTHER MORE STATE COURTS OF THIS FOR ON ALL OTHER MATTERS IN ACCORDANCE
WITH R.4-54-2.

ATTENTION:

ATT: ALBERT DEGENNARO
ALBERT DEGENNARO
SUITE 200
12 CHRISTOPHER WAY
MAYWOOD NJ 07724-3331

DEGENNARO